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United States General Accounting Office

GAO

Fact Sheet for the Honorable  
Ron Marlenee, House of Representatives

November 1987

# OCCUPATIONAL SAFETY & HEALTH

## Federal Costs Incurred in Developing Field Sanitation Standard



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Human Resources Division

B-229593

November 27, 1987

The Honorable Ron Marlenee  
House of Representatives

Dear Mr. Marlenee:

In response to your May 6, 1987, letter and later discussions with your office, we obtained information on federal costs incurred in developing the Occupational Safety and Health Administration's (OSHA's) field sanitation standard for agricultural employers. This standard, which was issued May 1, 1987, and took effect July 30, 1987, requires agricultural employers to provide to field laborers, at no cost, drinking water and toilet and handwashing facilities. Specifically, you asked us to obtain the following information concerning this standard:

- OSHA personnel costs since 1972;
- Costs of studies done by federal agencies and contractors;
- Costs of public hearings conducted;
- Federal legal costs incurred for proceedings carried out by OSHA, the Department of Justice, and the federal court system;
- Costs of printing draft and final versions of the standard;
- Estimated costs for covered agricultural employers to comply with the standard; and
- Estimated costs to enforce the standard, including inspection efforts.

With the concurrence of your office, our inquiry focused on obtaining available documentation and information on costs from OSHA and other federal agencies concerned with developing and issuing the field sanitation standard. In this regard, we conducted interviews with OSHA's Office of the Assistant Secretary, the Civil Division and the Civil Appellate Division of the U.S. Department of Justice, the Division of Standards Development and Technology Transfer of the National Institute of Occupational Safety and Health (NIOSH), and the U.S. District Court and U.S. Court of Appeals, District of Columbia Circuit.

Actual cost data were not compiled or maintained by OSHA or other federal organizations for most of the items you specified. Also, because about 15 years elapsed between the time the standard was first proposed and its issuance, even where the agencies did collect information, much of it had to be reconstructed. Consequently, most of the information OSHA and the other federal agencies provided was based on estimates. We did not determine the reliability of the cost data provided by the agencies.

The information we were able to obtain on the costs of development, compliance, and enforcement of the field sanitation standard is summarized in the following sections and discussed in detail in the fact sheet.

#### COSTS TO DEVELOP THE STANDARD

OSHA and the other federal agencies estimated that about \$626,000 was spent during development of the standard for such activities as legal proceedings, public hearings, printing, and contract services. OSHA could not, however, estimate the total salary costs of its personnel because sufficient information was not available on the amount of time they spent working on the standard. As a result, the total costs to develop the standard could not be estimated. But we believe that the total cost to develop the standard would be significantly higher than \$626,000 if the personnel costs were included.

#### OSHA Personnel Costs

Between 1974 and 1987, at least 27 OSHA staff members worked on the standard for varying amounts of time. OSHA provided sufficient data to develop personnel cost information for nine of these staff. While five of the staff spent 5 percent or less of their time working on the standard, the other four worked on it from 2 to 3.5 years, for 50 to 90 percent of their time. Salary costs for these nine staff were estimated to exceed \$200,000. For the other 18 staff members, the only information OSHA provided was their grade levels. No data were available on the amount of time they worked on the standard.

Costs of Studies by Federal  
Agencies and Contractor

One contractor carried out a study costing \$234,960 that resulted in two reports, according to OSHA, and NIOSH did a study and issued a report estimated to cost about \$55,000.

Costs for Public Hearings

With respect to five public hearings held in 1984, OSHA's cost data showed that it incurred expenses of \$91,529. NIOSH reported estimated expenses totaling \$1,905.

Legal Costs Incurred  
by Federal Agencies and Court System

From 1975 to 1987, five attorneys from Labor's Office of the Solicitor worked on the standard at a cost of \$174,935, according to that office, which represents the Department's components on legal issues. Another attorney worked on the standard for about 18 months from 1975 to 1977, but as available records did not show how much time he spent on it, costs of his efforts could not be compiled.

Between 1981 and 1987, six Department of Justice attorneys worked on two cases involving the standard at a cost of \$29,929, the Department reported. The U.S. District Court and the U.S. Court of Appeals, both in the District of Columbia, do not compile cost information by case for time spent by judges and attorneys, according to clerks of the courts.

Costs of Printing Standards

Since 1976, OSHA incurred printing expenses for several items, according to Labor officials. These included (1) two proposals of rulemaking--one in 1976 for which no cost information was available and another in 1984, at a cost of \$8,759; (2) at least four notices to inform the public of the status of the proposed standard, at a cost of \$7,830; and (3) printing the final standard, at a cost of \$21,161.

COMPLIANCE COSTS

Agricultural employers nationwide will spend, according to OSHA, an estimated \$50 million to provide field sanitation facilities covered by the standard--an average cost of \$1.09 per worker per day. Less than half (\$24 million) of this

cost, however, was directly attributable to the standard. According to OSHA, employers already would have spent about \$26 million because some states required comparable field sanitation facilities or employers were providing sanitation facilities voluntarily.

ENFORCEMENT COSTS

OSHA officials expect to be able to determine the costs for enforcing the federal sanitation standard after they complete the inspection activities scheduled for fiscal years 1987 and 1988. For fiscal year 1987, OSHA conducted 291 inspections in the 30 states without OSHA-approved state plans; states with OSHA-approved plans had until November 1987 to comply with the standards. In fiscal year 1988, OSHA intends to conduct 415 inspections in states with approved plans and 675 in states without approved plans.

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We discussed the contents of this fact sheet and the results of our work with responsible OSHA program officials and considered their comments in preparing the document. Unless you publicly announce its contents earlier, we plan no further distribution of this fact sheet until 14 days from its issue date. At that time, we will provide copies to OSHA and the other federal agencies discussed in this fact sheet. Also, copies will be made available to others on request.

Please call me on 275-5451 if you have any questions related to this fact sheet.

Sincerely yours,

  
Janet L. Shikles  
Associate Director

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ABBREVIATIONS

GS	General Schedule
NIOSH	National Institute of Occupational Safety and Health
OSHA	Occupational Safety and Health Administration

OCCUPATIONAL SAFETY AND HEALTH:  
FEDERAL COSTS INCURRED IN DEVELOPING  
FIELD SANITATION STANDARD

INTRODUCTION

The Occupational Safety and Health Administration (OSHA), established as an agency of the Department of Labor by the Occupational Safety and Health Act of 1970, was given a broad mandate to protect American workers from health and safety hazards and ". . . to assure so far as possible every working man and woman in the nation safe and healthful working conditions and to preserve our human resources."

One of OSHA's principal tasks is to develop standards in the form of rules or regulations to implement its mandate to protect workers. The agency's standards fall into four broad employment categories--general industry, maritime, construction, and agriculture. In deciding whether a specific employment situation warrants a standard, OSHA follows a four-step chronology. It

1. determines whether exposure to a hazard poses a significant risk,
2. determines that the proposed standard would reduce the risk substantially,
3. collects and analyzes pertinent data, and
4. determines the most efficient and effective way of attaining the standard.

Once a standard is published, OSHA enforces it through a nationwide network of OSHA offices or through state agencies in states where OSHA-approved state occupational safety and health plans are in effect.

Requirements for providing sanitation facilities are included in OSHA's general industry, construction, and maritime standards, according to the agency, and apply to all employers covered by these standards. Through the years, OSHA has published several standards for safeguarding the safety and health of agricultural workers. None, however, covered field sanitation facilities--farm owners making available toilets, drinking water, and handwashing facilities for laborers.

The history of the field sanitation standard for agricultural employers spans 15 years, culminating in May 1987 when the standard was issued. The Congress of Hispanic American Citizens petitioned OSHA in 1972 to require sanitary facilities for agricultural field workers. In 1982, after 10 years of litigation, a U.S. District Court ordered OSHA to complete

rulemaking, which could include the option of not issuing a standard, within 15-18 months. In April 1985, Labor announced that it would not issue a standard because of (1) the low priority in enforcement compared with other health and safety standards and (2) the belief that the states could ensure the protection of agricultural field workers better than could the federal government.

In May 1985, the Farmworker Justice Fund, on behalf of itself and 28 other organizations, filed a petition to the U.S. Court of Appeals of the District of Columbia Circuit for reconsideration of Labor's decision. The Secretary of Labor deferred federal action for 18 months to give states the opportunity to develop and implement adequate standards. During this time, OSHA established guidelines to evaluate the states' field sanitation standards where they existed and a timetable for states without such standards to develop them.

On February 6, 1987, in response to the Farmworker Justice Fund suit, the U.S. Court of Appeals of the District of Columbia Circuit ordered the Secretary of Labor to issue a federal standard. The Court held that the Secretary's deferral decision was based on factors that could not be lawfully considered, including the Secretary's (1) preference for state rather than federal standards, (2) refusal to promulgate standards because the Congress does not allow OSHA to regulate farms with 10 or fewer workers, and (3) unreasonable expectation that states would develop and implement adequate standards within 18 months.

On May 1, 1987, OSHA published a standard on field sanitation for agricultural employers. This standard requires agricultural employers of 11 or more field workers to provide toilets, drinking water, and handwashing facilities to the workers at no cost. It addresses concerns that, as such workers provide hand labor to cultivate and harvest food and fiber crops, they may contract and pass on communicable diseases as they move from one area to another. OSHA estimated that the standard will cover 472,000 workers, with California and Florida having the most covered workers (29.2 and 13.3 percent, respectively). The other states have between zero and 8.4 percent of their workers covered by the standard.

#### OBJECTIVES, SCOPE, AND METHODOLOGY

In a letter from Congressman Ron Marlenee dated May 6, 1987, and in subsequent discussions with his office, we were asked to obtain the following information concerning the field sanitation standard:

-- OSHA personnel costs since 1972;

- Costs of studies done by federal agencies and contractors;
- Costs of public hearings conducted;
- Federal legal costs incurred for proceedings carried out by OSHA, the Department of Justice, and the federal court system.
- Costs of printing draft and final versions of standard;
- Estimated costs for covered agricultural employers to comply with the standard; and
- Estimated costs to enforce the standard, including inspection efforts.

Although we attempted to obtain documentation and information on costs from OSHA and other federal agencies involved in developing and issuing the standard, we found that the agencies did not retain records for its entire 15-year development period. Also, the agencies we contacted did not routinely track and account for costs in the specific categories discussed above, they told us.

In response to our request for available cost data for 1972-87, OSHA officials developed information concerning professional staff known to have been assigned to work on this standard from 1974 to 1987. OSHA gave us limited personnel data, however, because it does not routinely compile such costs and could not reconstruct personnel cost data from available documentation. But OSHA did prepare estimates of the costs of holding certain hearings and printing the standard and provided actual cost data on studies done by contractors. OSHA's estimate of the costs for covered agricultural employers to provide the required facilities was included in the standard.

The only other federal agency to directly assist in developing the field sanitation standard was the National Institute of Occupational Safety and Health (NIOSH), according to OSHA officials. At our request, NIOSH officials furnished cost estimates and other information regarding their participation in the process. Department of Justice officials provided data on legal costs incurred for two court cases and discussed Justice's activities regarding this standard. We contacted the Clerks of the U.S. District Court and the U.S. Court of Appeals of the District of Columbia Circuit for data on judicial costs related to their involvement in the legal proceedings.

## COSTS TO DEVELOP STANDARD

About \$626,000 was spent during the standard's development for such activities as legal proceedings, public hearings, printing, and contract services, OSHA and the other federal agencies estimated. OSHA could not estimate the total salary costs of its personnel, however, because sufficient information was not available on the amount of time spent working on the standard. As a result, the total cost to develop the standard could not be estimated. But we believe that the total cost would be significantly higher than \$626,000 if the personnel costs were included.

### OSHA Personnel Costs Unavailable

Development by OSHA of any safety and health standard requires the participation and coordination of several agency components. The Office of Regulatory Analysis, for example, furnishes advice and guidance to standards' project officers on the economic and environmental consequences of proposed new standards. The Health Standards Program Directorate coordinates regulation of health standards throughout OSHA with Labor's Office of the Solicitor (this office represents the Department and its components on legal issues).

In addition, when the field sanitation standard for agricultural employers was being developed and issued, there was cooperation from OSHA's Health Safety Directorate, Field Operations Directorate, Federal/State Operations Directorate, and Office of Information and Consumer Affairs. Other administrative support staff also participated.

OSHA did not routinely compile the personnel cost information we required, OSHA officials told us. At our request, OSHA attempted to reconstruct these data, but the information provided was generally incomplete. OSHA gave us a list of professional staff known to have been involved in developing the standard from 1974 to 1987, their grade levels, and (for about one-third of the staff) estimates of how much time each spent working on this standard. But OSHA could not compile accurate cost estimates because

- the information was developed largely from memory by OSHA staff and was incomplete for some persons included on the list, and
- for most of those on the list, there were no details involving within-grade steps, which would have provided specific information on the salaries paid to these individuals.

Furthermore, there was no way for us to verify the data generated by OSHA.

At least 27 OSHA staff members worked on developing the standard between 1974 and 1987, according to OSHA documentation. A staff member seldom spends 100 percent of his/her time on any single rule or standard, OSHA officials told us. For 9 of the 27 staff members listed, OSHA estimated their time spent on the field sanitation standard from 0.5 percent (usually top managers) to 90 percent (usually project managers at the GS-13 grade level). Of the nine staff members, four worked from 2 to 3.5 years on the standard, spending from 50 to 90 percent of their time. We estimated the salary costs of the nine staff members to exceed \$200,000. For the other 18 staff members, the only information OSHA provided was their grade levels. Most of the OSHA staff who worked on the standard were GS-12 or above, as table 1 shows.

Table 1:

OSHA Professional Staff Involved in Developing the Field Sanitation Standard (by Grade Level)

<u>Grade level</u>	<u>No.</u>
Senior Executive Service	3
GS-15	5
GS-14	2
GS-13	7
GS-12	4
GS-12/GS-13a	1
GS-11/GS-12a	2
GS-07/GS-09/GS-11/GS-12a	1
Not specified	<u>2</u>
Total	<u>27</u>

<sup>a</sup>These staff members received promotions while assigned to work on this standard.

Cost of Studies Done by Federal Agencies and Contractors

OSHA carried out no studies as the field sanitation standard was being developed, agency officials said, but in fiscal year 1982 awarded a study contract to Centaur Associates, Inc. According to OSHA officials, the actual cost of the contract was \$234,960. It called for two reports to provide an objective basis for establishing the minimum requirements for field sanitation facilities.

- The first report, published September 9, 1983, provided an agriculture industry profile and discussed the population at risk, affected work places, health effects from infectious diseases, and compliance methods and costs.
- The second report, published April 10, 1984, included compliance costs, cost estimates of field sanitation, several baseline alternatives, and information about the potential effects of the standard on agricultural employers.

A 1981 report NIOSH prepared at OSHA's request on the need for a field sanitation standard cost \$55,000, a NIOSH official estimated. An agency of the Department of Health and Human Services, NIOSH conducts research on various safety and health problems, provides technical assistance to OSHA and other federal agencies, and recommends standards for OSHA's adoption.

#### Cost of Public Hearings

Although it does not routinely compile costs of public hearings relative to development of its standards, OSHA reconstructed for us cost data for expenses relating to 1984 hearings on the field sanitation standard. Total OSHA costs were \$91,528.70 for five hearings held between May 23 and June 26, 1984, in Washington, D.C.; Orlando, Florida; Lubbock, Texas; Toledo, Ohio; and Fresno, California. The OSHA cost data, as well as estimated costs to NIOSH of \$1,905 for one of the hearings, are summarized in table 2.

Table 2:  
Costs for Public Hearings Held on the  
Development of OSHA's Field Sanitation Standard  
(Fiscal Year 1984)

<u>Activity</u>	<u>Cost</u>
By OSHA:	
Hearing transcript preparation	\$10,036.95
Translation of testimony (Spanish to English) and docket submissions	16,068.04
Translation of testimony (Florida only-- Creole to English)	2,400.00
Expert witness (urology)	4,579.57
Expert witness (public health-parasitology)	7,305.20
Expert witness (enteric diseases)	7,175.62
Expert witness (heat stress among farm workers)	4,337.50
Review of clinical testimony at hearings and evaluation of epidemiologic evidence	9,166.67
Services of in-house contract physician to evaluate clinical evidence and testimony	1,440.00
Independent risk assessment	18,902.80
Travel to four hearing sites	8,429.49
Travel in support of developing the standard	<u>1,686.86</u>
Subtotal OSHA	<u>91,528.70</u>
By NIOSH:	
Hearing preparation	930.00
Travel to one hearing site	<u>975.00</u>
Subtotal NIOSH	<u>1,905.00</u>
Total	<u>\$93,433.70</u>

No other hearings relating to the field sanitation standard were conducted, OSHA officials told us.

Legal Costs Incurred by Federal Agencies and Court System

Several federal entities were judicially involved in the evolution of the field sanitation standard from 1972 to 1987. These were the Department of Labor's Office of the Solicitor, which represents the Department and its components on legal issues; the Department of Justice; the U.S. District Court of the District of Columbia; and the U.S. Court of Appeals for the District of Columbia.

Labor's Office of the Solicitor does not routinely compile personnel costs by assignment or case; its attorneys may be assigned to work on several cases and federal standards at one time. Attorneys' involvement can include drafting a standard's legal background, conducting or participating in public hearings, analyzing data, and/or monitoring legal issues.

Six attorneys participated in developing the field sanitation standard, according to the Office of the Solicitor. Based on the information provided for five of the attorneys, we calculated their personnel costs while working on the standard to be \$174,935. The sixth attorney was a GS-14 who worked on the standard for about 18 months between 1975 and 1977, according to the office. But, as available records did not show how much time he spent working on that standard, we could not develop cost data for him.

Between 1981 and 1985, the Department of Justice was involved in the U.S. District Court and the U.S. Court of Appeals (both in the District of Columbia) on the case of the Congress of Hispanic American Citizens versus the Secretary of Labor.<sup>1</sup> According to the Department, five attorneys spent over 264 hours on this case at an estimated cost of \$14,810. Justice also was involved in the case of the Farmworker Justice Fund, Inc., versus the Secretary of Labor, decided by the U.S. Court of Appeals, District of Columbia Circuit, on February 6, 1987 (811 F. 2d 613 D.C. Cir. 1987). One attorney worked on this case for 266 hours at an estimated cost of \$15,119, according to the Department, making Justice's total estimated legal costs \$29,929. The Department provided no information on any prior federal court cases related to the field sanitation standard.

The U.S. District Court and the U.S. Court of Appeals do not compile cost information by case for the time spent by judges and attorneys, the Clerks of the Courts told us.

#### Costs of Printing Standards

Since 1976, OSHA incurred printing expenses for several items relative to the field sanitation standard, according to OSHA officials. These included two proposals of rulemaking (in 1976 and 1984), several other notices (to inform the public of the status of the proposed standard), and the final standard (printed in the Federal Register).

While they could provide no information on the cost of the 1976 proposed rulemaking, OSHA officials said that the 1984 proposal cost \$8,759. This covered the initial Government Printing Office set-up for the first copy and 3,500 copies. OSHA issued at least four notices (a total of 20 pages) announcing its decisions on the proposed standard as it evolved, such as

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<sup>1</sup>On March 6, 1985, the case was transferred from the District Court to the U.S. Court of Appeals under the authority of International Union, United Automobile, Aerospace and Agricultural Implement Workers of America, UAW, et al., v. Donovan, 756 F. 2d 162 (D.C. Cir. 1985).

reopening the rulemaking record, according to information given us. There were no reprints, an OSHA official said, and the notices cost about \$7,830 to publish in the Federal Register. To print 20,000 copies of the final standard cost \$21,161.

#### COMPLIANCE COSTS TO FARMERS

The field sanitation standard calls for farm employers to provide drinking water, toilet facilities, and handwashing water for field workers at no cost and to properly maintain the facilities and drinking water. Adequate supplies of the drinking water, single-use drinking cups, handwashing water, soap, and paper towels are required. Employers may provide either permanent or temporary facilities and must afford employees the opportunity to use them.

OSHA estimated the total annual costs of employer compliance to provide field sanitation facilities to be \$50.4 million. OSHA believes that less than half (\$24 million) is attributable to the standard because some states already required comparable field sanitation facilities and many agricultural employers were providing sanitation facilities voluntarily.

The average daily costs to farm employers of compliance will be about \$1.09 per worker, an increase of about 3.0 percent in employers' labor costs, OSHA estimates. This includes the costs to rent and service toilets, provide handwashing facilities, and furnish drinking water. OSHA's estimates also include the costs of periodically moving the sanitation facilities (as in some situations, work forces are relocated several times a day), notifying employees of the location of the sanitation facilities, and reminding employees about practicing good hygiene.

The 20 states with OSHA-approved state plans had until November 1, 1987, to amend their existing field sanitation standards (if necessary) or adopt OSHA's standard. Such states are those with occupational health and safety standards at least as effective as comparable OSHA standards. Compliance by the 30 states without approved state plans, which come under the OSHA standard, was required as of July 30, 1987, for all provisions of the standard.

#### ENFORCEMENT RESPONSIBILITIES SHARED BY OSHA AND STATES

OSHA's field sanitation standard is enforced through inspections of agricultural work sites by OSHA staff or, in states with OSHA-approved plans, state staff. As of September 1987, OSHA officials had not developed cost estimates for enforcing the field sanitation standard. According to an OSHA official, it will be able to determine costs after completing the inspection activities scheduled for fiscal years 1987 and 1988.

In deciding which work places to inspect to enforce its standards, OSHA uses an established system of four priorities as follows:

1. Imminent danger situations--those likely to cause death or serious injury;
2. Catastrophes and fatal accidents;
3. Serious, formal complaints by employees against their employers; and
4. Programmed inspections, which OSHA schedules after considering available data concerning the industries and activities in which occupational safety and health hazards are most likely to exist.

States with OSHA-approved plans assume responsibility for the administration and enforcement of their occupational safety and health laws, for which the federal government provides up to 50 percent of needed funding. States may differ from the federal priority system in scheduling work places for inspection. For fiscal years 1987 and 1988, OSHA plans to enforce the field sanitation standard through programmed inspections--the fourth priority discussed above.

During fiscal years 1987-88, inspections will be conducted by OSHA compliance officers, who have been instructed to look for agricultural hand-labor operations when they are in rural areas where such activities may be in progress. While field sanitation standard inspections are described as "programmed," an OSHA official told us that no sites will be scheduled in advance. As a result, no specific schedule will be compiled; in effect the compliance officers will conduct random visits.

In states in which the standard has not been adopted or has not taken effect, OSHA will provide interim federal enforcement by responding to field workers' complaints. But OSHA compliance officers have limited experience, an OSHA official told us, in enforcing standards and conducting inspections in the agricultural sector. Historically, OSHA has concentrated its enforcement resources in the manufacturing, construction, and maritime industries.

On July 7, 1987, the OSHA Field Operations Director instructed regional administrators to initiate inspections if (1) the compliance officer observes a violation of the standard or circumstances indicate the probability of one or more violations, and (2) it appears the agricultural employer is covered by the standard. During fiscal years 1987-88, an OSHA official told us, no special training of compliance officers will be provided.

OSHA compliance officers are expected to be familiar with the OSHA standard, especially the preamble, which contains a discussion of OSHA's interpretation of the specific requirements of the standard.

OSHA told us in October 1987 that 291 inspections had been done in fiscal year 1987 in the 30 states without approved plans.<sup>2</sup> Beginning in fiscal year 1988, OSHA plans to inspect annually at least 2 percent of farm employers covered by the federal standard (about 1,000 each year). This percentage is about the same as the proportion of organizations in the construction, manufacturing, and maritime industries subject to annual programmed inspections by OSHA compliance officers concerning applicable federal standards. The number of field sanitation inspections in each state will be based on the estimated number of covered farmworkers. In fiscal year 1988, for states with OSHA-approved plans, the projected number of inspections is 415; for states without state plans, 675 are contemplated.

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<sup>2</sup>When the OSHA field sanitation standard took effect on July 30, 1987, only about 2 months remained in fiscal year 1987.

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